

### REMARKS

Claims 1-20 are pending in this application. Claims 1-20 have been amended. New claims 21 and 22 have been added. No new matter has been added. The applicant respectfully traverses this rejection and requests reconsideration in view of the amendments to the claims and the following remarks.

#### I. The 102 Rejections

Claims 1-3, 5-9, 11-13, 15, 17, and 19 were rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent 6, 473, 673 (Kleyman). Applicant respectfully traverses the rejection.

Kleyman describes a target CAD system that is used to design an assembly in a target format and a source CAD system that is used to design a constituent component of the assembly in a second, different format. Kleyman describes techniques for automatically updating the assembly in the target CAD system when changes to the constituent component are made in the source CAD system (Col. 3, lines 6-11; col. 4, lines 27-31).

In contrast to Kleyman, claim 1, as amended, recites translating one or more assembly constraints of the mechanical design assembly where translating assembly constraints includes converting a data format of the assembly constraints from a first format of a first design system to a second, different format of a second, different design system.

For the claim limitation of translating assembly constraints, the examiner cites to a portion of Kleyman (Col. 3 lines 20-31, and col.9 lines 1-13) that describes generating a representation of the assembly in the target format. The examiner then states that he interprets the representation as containing assembly constraints that interrelate the components of the assembly because Kleyman discloses that CAD systems conventionally have data that instructs how to combine components of an assembly (Office Action, page 2).

However, even if the examiner is correct that the generated representation in the target format contains assembly constraints that interrelate the components of the assembly (which is not conceded), this only shows that assembly constraints are generated in the target format. Kleyman does not teach or suggest that assembly constraints are converted from the source format to the target format, or vice versa. In fact, Kleyman does not disclose that assembly

constraints are in the source format. Kleyman only discloses that a constituent component of the assembly is in the source format. Kleyman does not disclose that interrelationships between the constituent component and other components of the assembly are in the source format, much less that these interrelationships are converted from the source format into the target format. Thus, the applicant respectfully submits that Kleyman fails to disclose the recited step of translating assembly constraints. Claim 1 is, therefore, allowable over Kleyman.

Claims 2, 3, 5 and 6 depend from claim 1 and are allowable over Kleyman for at least the reasons set forth in connection with claim 1.

Claim 7 requires an article of manufacture including programming instructions to enable a host inactive to translate one or more assembly constraints. For at least the reasons above regarding claim 1, Kleyman fails to disclose translating assembly constraints. Claim 7 is, therefore, allowable over Kleyman. Claims 8 and 9 depend from claim 7 and are allowable over Kleyman at least for the same reasons as claim 7.

As discussed above in reference to claims 1 and 7, Kleyman does not disclose translating one or more assembly constraints. Claim 11 is, therefore, allowable over Kleyman at least for the same reasons as set forth above in connection with claims 1 and 7. Claims 12 and 13 depend from claim 11 and are allowable over Kleyman for at least the same reasons as claim 11.

Claim 15 requires translating one or more assembly constraints. For at least the reasons discussed above in reference to claim 1, Kleyman does not disclose translating assembly constraints. Claim 15 is, therefore, allowable over Kleyman.

Claim 17 requires translating one or more assembly constraints. For at least the reasons discussed above in reference to claim 1, Kleyman does not disclose translating assembly constraints. Claim 17 is, therefore, allowable over Kleyman. Claim 18 depends from claim 17 and is allowable over Kleyman at least for the reasons as claim 17.

Claim 19 requires translating one or more assembly constraints. For at least the reasons discussed above in reference to claim 1, Kleyman does not disclose translating assembly constraints. Claim 19 is, therefore, allowable over Kleyman.

## II. 103 Rejections

Claims 4, 10, 14, 16, and 18 are rejected under 35 U.S.C. 103(a) as being unpatentable over Kleyman and further in view of U.S. Patent 5, 410, 496 (Bolon).

Claim 4 depends from claim 1. As discussed above, Kleyman fails to disclose the limitations of the base claim 1. Bolon fails to cure the deficiencies of Kleyman. Bolon shows using constraints to find configurations of collections of geometric elements (Abstract). Bolon fails to translate these constraints. Because neither Bolon nor Kleyman, separately, or in combination, show or suggest the claim limitation of translating assembly constraints, claim 4 is allowable over Kleyman in view of Bolon.

Claim 10 depends from claim 7. As discussed above, Kleyman fails to disclose the limitations of the base claim 7. Bolon fails to cure the deficiencies of Kleyman. Bolon shows using constraints to find configurations of collections of geometric elements (Abstract). Bolon fails to translate these constraints. Because neither Bolon nor Kleyman, separately, or in combination, show or suggest the claim limitation of translating assembly constraints, claim 10 is allowable over Kleyman in view of Bolon.

Claim 14 depends from claim 11. As discussed above, Kleyman fails to disclose the limitations of the base claim 11. Bolon fails to cure the deficiencies of Kleyman. Bolon shows using constraints to find configurations of collections of geometric elements (Abstract). Bolon fails to translate these constraints. Because neither Bolon nor Kleyman, separately, or in combination, show or suggest the claim limitation of translating assembly constraints, claim 14 is allowable over Kleyman in view of Bolon.

Claim 16 depends from claim 15. As discussed above, Kleyman fails to disclose the limitations of the base claim 15. Bolon fails to cure the deficiencies of Kleyman. Bolon shows using constraints to find configurations of collections of geometric elements (Abstract). Bolon fails to translate these constraints. Because neither Bolon nor Kleyman, separately, or in combination, show or suggest the claim limitation of translating assembly constraints, claim 16 is allowable over Kleyman in view of Bolon.

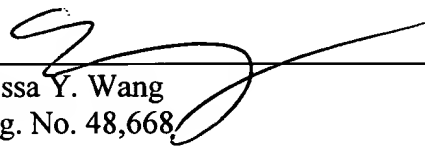
Claim 18 depends from claim 17. As discussed above, Kleyman fails to disclose the limitations of the base claim 17. Bolon fails to cure the deficiencies of Kleyman. Bolon shows using constraints to find configurations of collections of geometric elements (Abstract). Bolon fails to translate these constraints. Because neither Bolon nor Kleyman, separately, or in combination, show or suggest the claim limitation of translating assembly constraints, claim 18 is allowable over Kleyman in view of Bolon.

Claim 20 depends from claim 19. As discussed above, Kleyman fails to disclose the limitations of the base claim 19. Bolon fails to cure the deficiencies of Kleyman. Bolon shows using constraints to find configurations of collections of geometric elements (Abstract). Bolon fails to translate these constraints. Because neither Bolon nor Kleyman, separately, or in combination, show or suggest the claim limitation of translating assembly constraints, claim 20 is allowable over Kleyman in view of Bolon.

Applicant respectfully submits that all claims are in condition for allowance. No fees are believed to be due. Please apply charges or credits to deposit account 06-1050.

Respectfully submitted,

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